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Juniper Networks, Inc.

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN JOSE DIVISION**

11 CISCO SYSTEMS, INC.,	)	Case No. 5:14-cv-05344-BLF (PSG)
	)	
12 Plaintiff,	)	<b>DECLARATION OF JOSHUA GLUCOFT</b>
	)	<b>ON BEHALF OF NONPARTY JUNIPER</b>
13 v.	)	<b>NETWORKS, INC. IN SUPPORT OF</b>
	)	<b>CISCO SYSTEMS, INC.'S</b>
14 ARISTA NETWORKS, INC.,	)	<b>ADMINISTRATIVE MOTION TO FILE</b>
	)	<b>DOCUMENTS UNDER SEAL (DKT. NO.</b>
15 Defendant.	)	<b>426)</b>
	)	
16	)	Judge: Hon. Beth Labson Freeman
17	)	
18	)	

**DECLARATION OF JOSHUA GLUCOFT**

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. Where expressly indicated, I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Cisco Systems, Inc.’s (“Cisco”) Administrative Motion to File Documents Under Seal (Docket No. 426), which moves the Court for an order to file under seal the following item related to non-party Juniper:

- Paragraphs 375-77 of Exhibit 1 to the Declaration of Andrew M. Holmes (the “Black Opening Report”);
- Certain portions of Paragraph 79 to the Declaration of Andrew M. Holmes (the “Seifert Report”);
- Paragraphs 170-91 of Exhibit 12 to the Declaration of Andrew M. Holmes (the “Clark June 3, 2016 Report”)

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Cisco’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

3. The redacted portions of the exhibits described above contain direct quotes and references to the transcript of the deposition of Philip Kasten and Philip Shafer as Juniper’s corporate designees pursuant to a subpoena served on Juniper by Arista. The transcripts reflect substantive discussion of the technical underpinnings and development of Juniper’s highly proprietary software—which contains much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software architecture and development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software could

1 materially impair Juniper's intellectual property rights and could cause serious competitive  
2 consequences to Juniper's business positioning.

3 4. For these reasons, there is good cause to seal the redacted portions of the exhibits  
4 described above.

5 Executed on August 6, 2016 in Los Angeles, California.

6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct to the best of my knowledge.

8  
9 /s/ Joshua Glucoft

10 Joshua Glucoft  
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